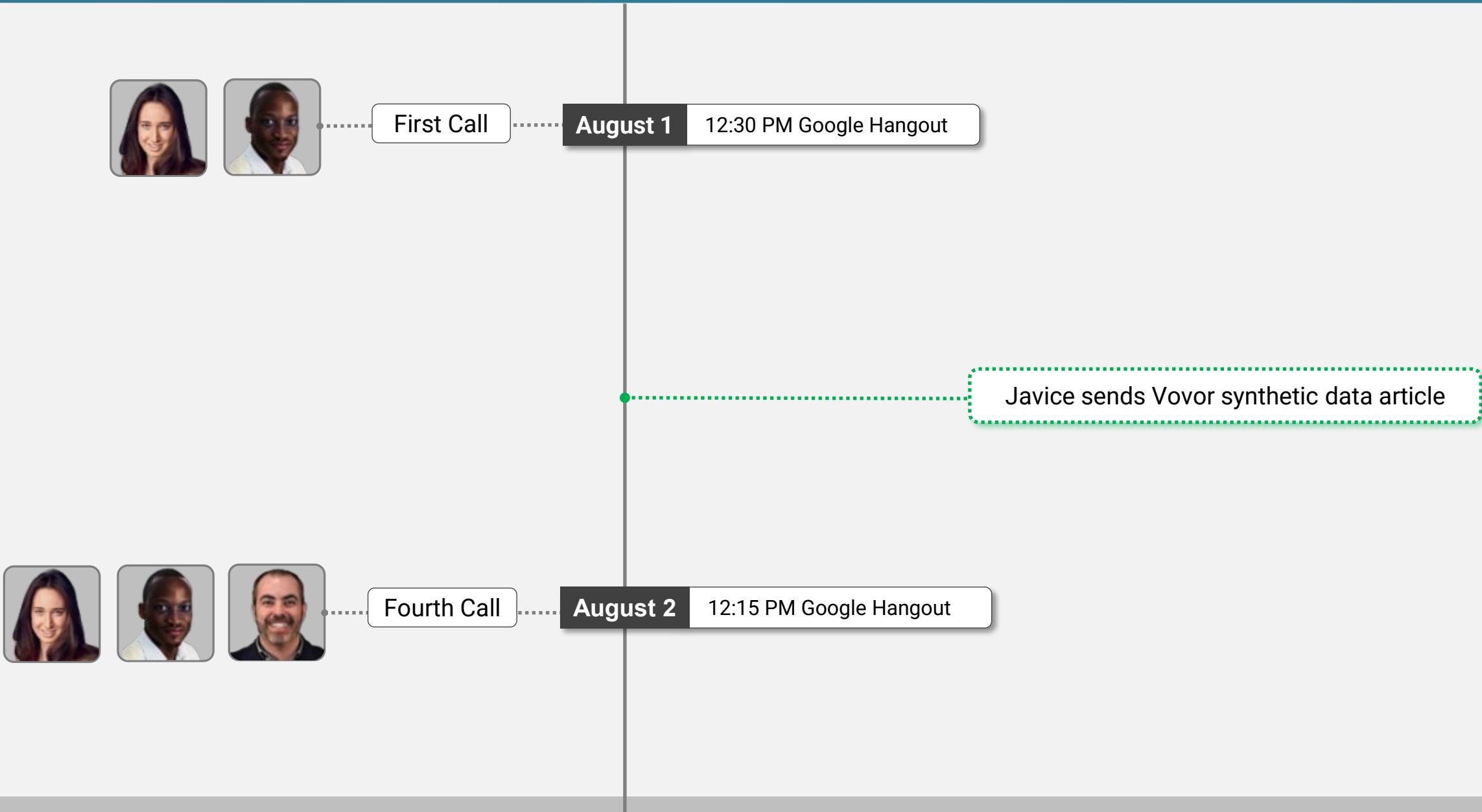
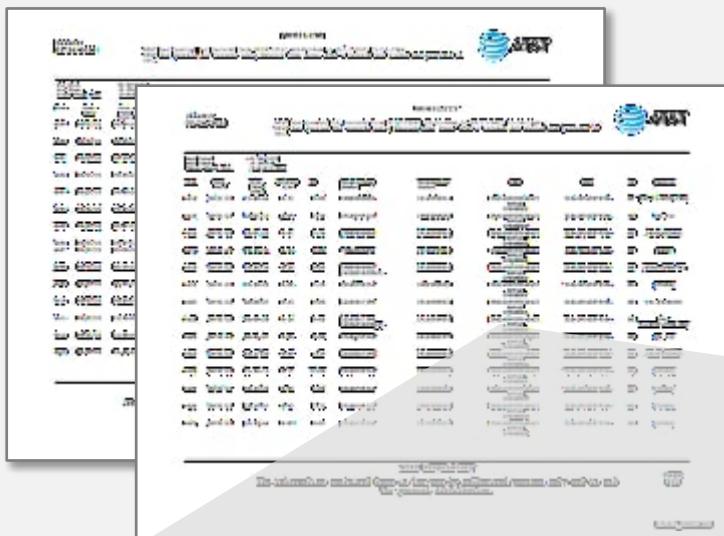


EXHIBIT C

PART 3 OF 3

The Truth

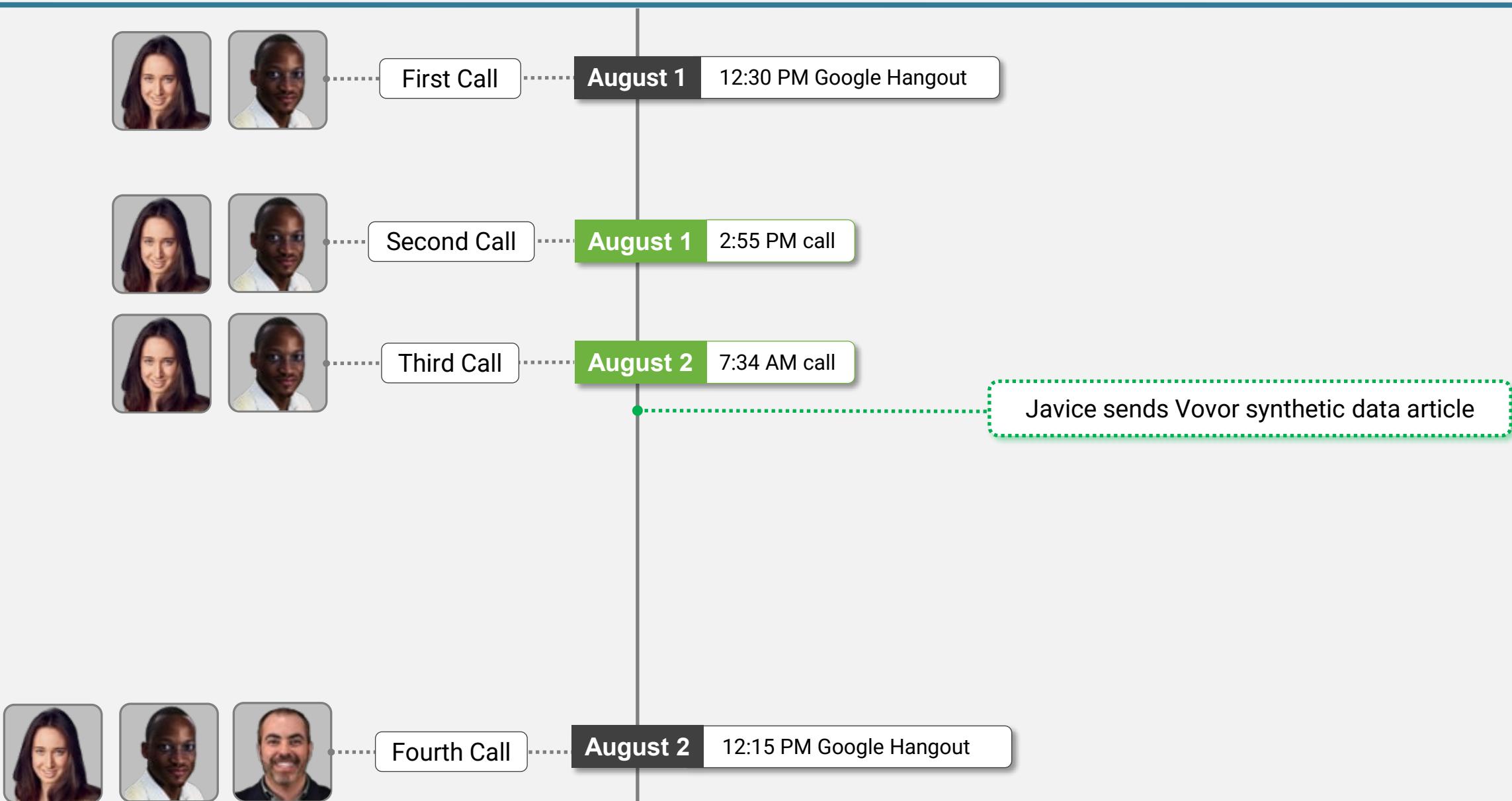


No Conspiracy. August 1-2**There Were Two Additional 1-on-1 Calls Before Aug. 2 Google Hangout**

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature		
4600	08/01/21	2:55 PM ET	0:08	9:02		9314		0041	 APPLE IPHONEXS		MO	[Wi-Fi]
4624	08/02/21	7:34 AM ET	0:17	12:20		9314		0041	 APPLE IPHONEXS		MO	[VCORR]

GOVERNMENT
EXHIBIT
902
5123(CP-251(AKH))

The Truth



No Conspiracy. August 1-2

Mr. Vovor Actually Viewed visitors-geo on Aug. 1

DIRECT EXAMINATION



Peter Manning
Managing Director

NAXO

Q. Mr. Manning, what action took place, according to this metadata, at . . . 12:53:33 Eastern time?

A. . . . it's viewed by GAIA ID ending in 582, at the time on August 1, 2021, 12:53:33 Eastern Standard Time.

Q. And the GAIA ID ending in 582, is that the one associated with patrick@withfrank.org?

A. That's correct.

Q. So does this mean on August 1, 2021, . . . patrick@withfrank.org viewed the document Visitors-Geo at 12:53:33 p.m. [ET]?

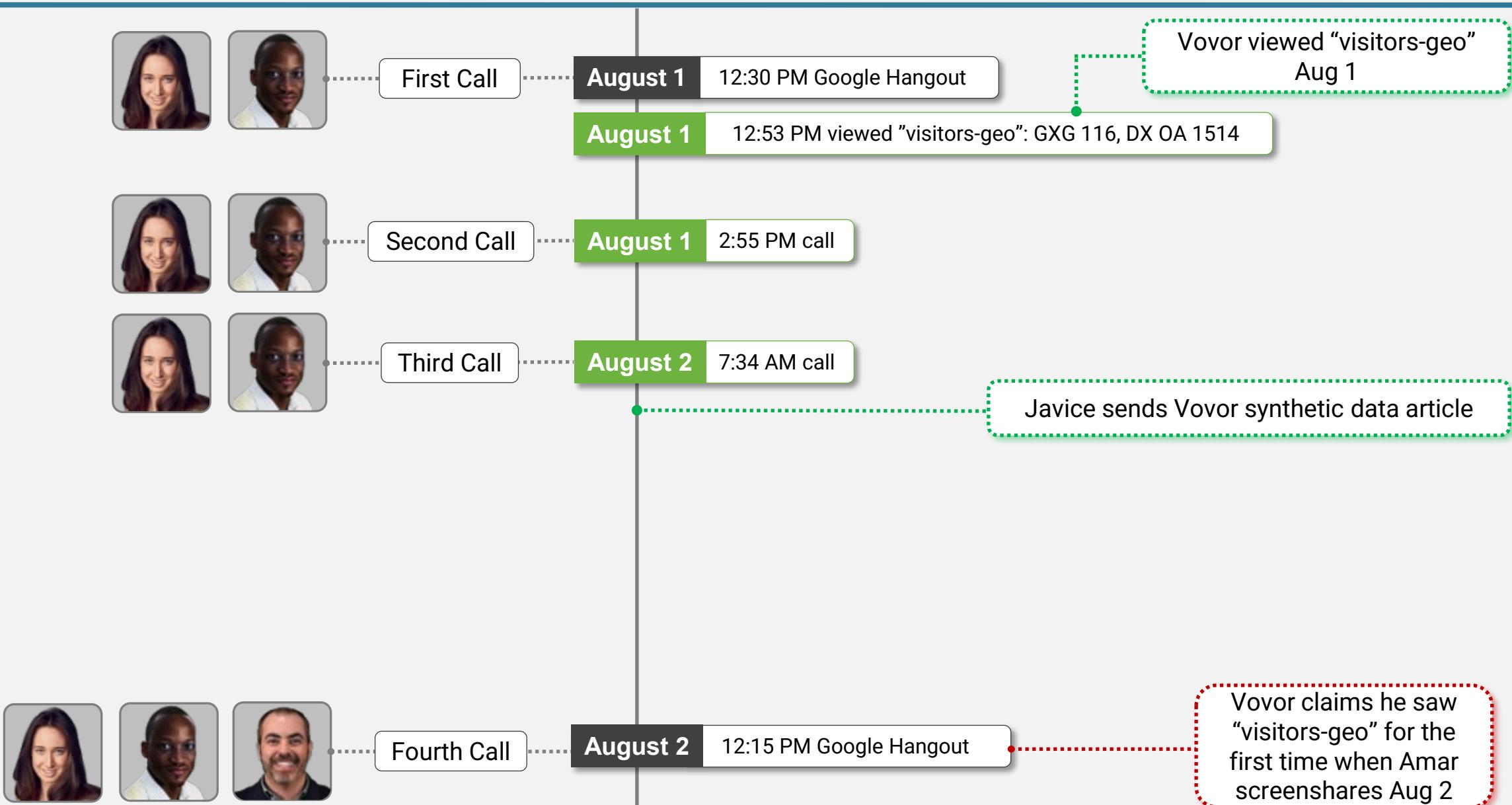
* * *

A. Yes, that's correct, viewed this document. That was the action by that user, patrick@withfrank.org.

12:53 PM ET

"user_info": {
 "[gaia_id](#)": 93937762582,
 "user": {
 "[gaia_id](#)": 93937762582,
 "[email_address](#)": "patrick@withfrank.org"
 }
},
"time": "2021-08-01 16:53:33 UTC",
"actor": {
 "user": {
 "[unknown_user](#)": {
 "[gaia_id](#)": 93937762582
 }
 }
},
"actions": [
 {
 "view": 0
 }
],
"target": {
 "item": {
 "file": {},
 "mime_type": "application/vnd.google-apps.ritz"
 },
 "item_id": {
 "id": "1QopM4myEMxkr_ZNUfpkm5uqVN2JEwj2vdlh7Jaku2hE"
 },
 "title": "visitors-geo",
},
"title": "visitors-geo",
DEFENDANT'S EXHIBIT
OA 1514
S1 23-Cr-251 (AKH)

The Truth



No Conspiracy – August 1-2

No One Viewed “visitors-geo” on Aug. 2

VOVOR'S STORY

THE COURT: Do you remember seeing this document [GXG 116] at around the time that you received Ms. Javice's memorandum?

THE WITNESS: I recall seeing this document only on August 2nd.

THE COURT: So your testimony is you did not open this link on the 1st?

THE WITNESS: I don't recall opening it on the 1st.

CROSS EXAMINATION



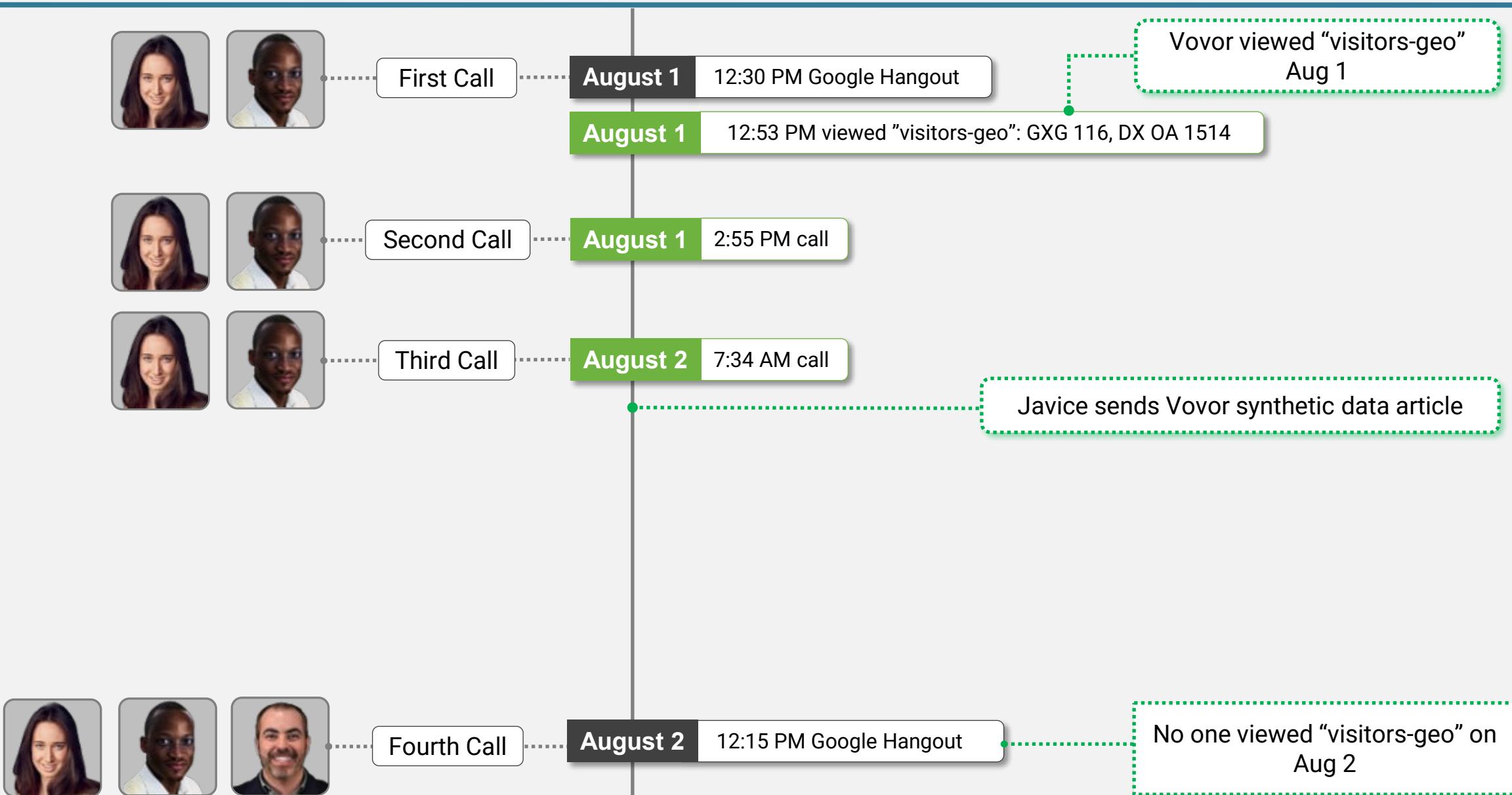
Patrick Vovor
Director of
Engineering

F R A N K .

THE TRUTH

There is no metadata [DX OA 1514] to suggest the “visitors-geo” document [GXG 116] was opened by anyone on August 2.

The Truth



No Conspiracy: August 1-2

Mr. Vovor Actually Viewed data_request on Aug. 1 During the Call with Ms. Javice

'time": "2021-08-01 16:56:02 UTC",

12:56 PM ET

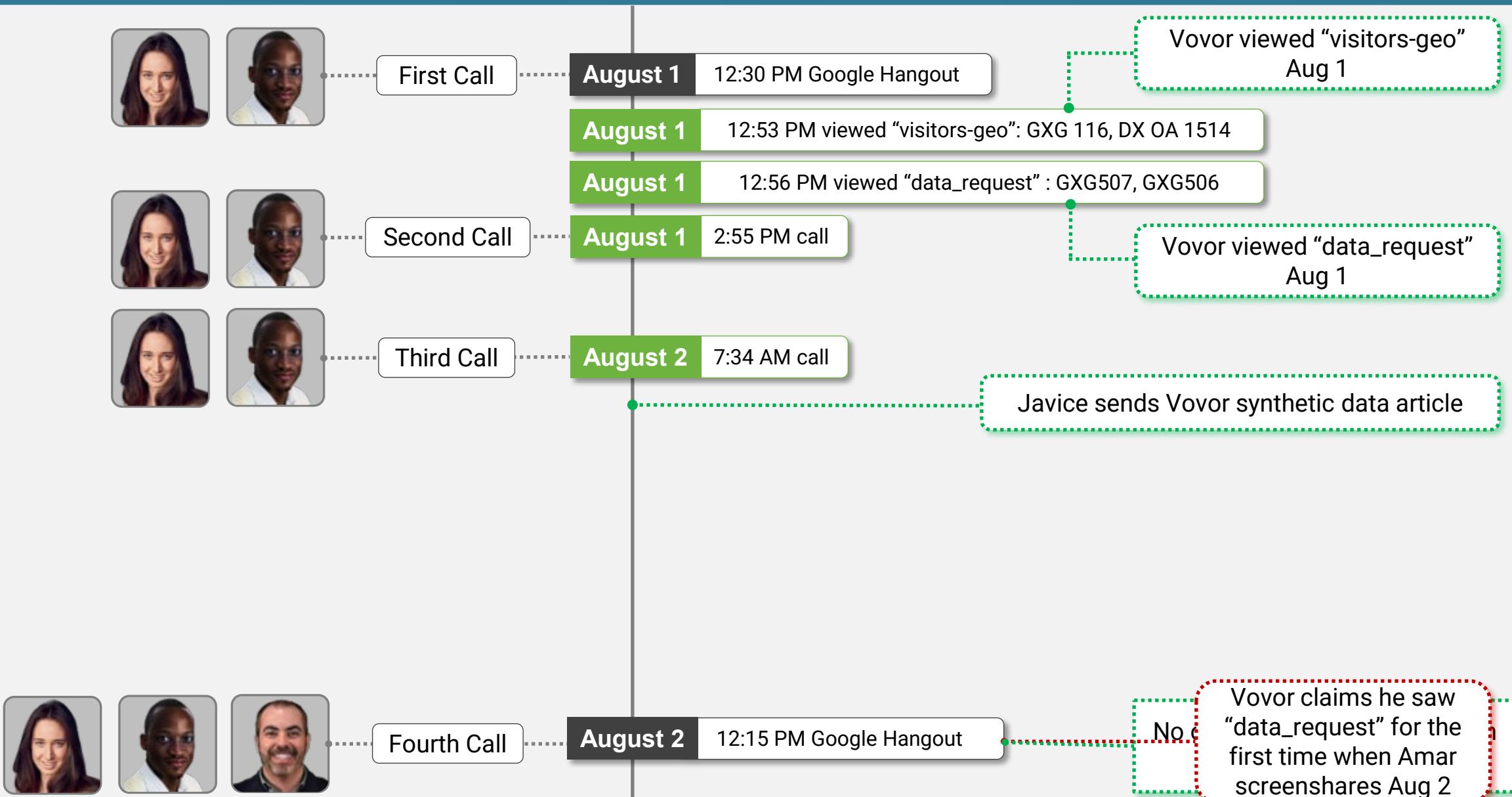
```
{  
  "time": "2021-08-01 16:56:02 UTC",  
  "actor": {  
    "user": {  
      "unknown_user": {  
        "gaia_id": 93937762582  
      }  
    }  
  },  
  "actions": [  
    {  
      "view": {}  
    }  
  ],  
  "target": {  
    "item": {  
      "file": {}  
    }  
  }  
}
```

```
"user_info": [  
  {  
    "gaia_id": 93937762582,  
    "user": {  
      "gaia_id": 93937762582,  
      "email_address": "patrick@withfrank.org"  
    }  
  }  
]
```

"title": "Data_Request",

GOVERNMENT
EXHIBIT
G-507
51 23 Cr. 254 (AKH)

The Truth



No Conspiracy: August 1-2

Ms. Javice Asked Mr. Vovor to Pull Data Before Aug. 2 Call

CROSS
EXAMINATION



Patrick Vovor
Director of
Engineering
F R A N K.

Q. Does this refresh your recollection that Ms. Javice, before the call, asked you to provide access to customer data so that she could do an analysis?

* * *

A. Yes.

* * *

Q. So that would be 11:45, before the call.

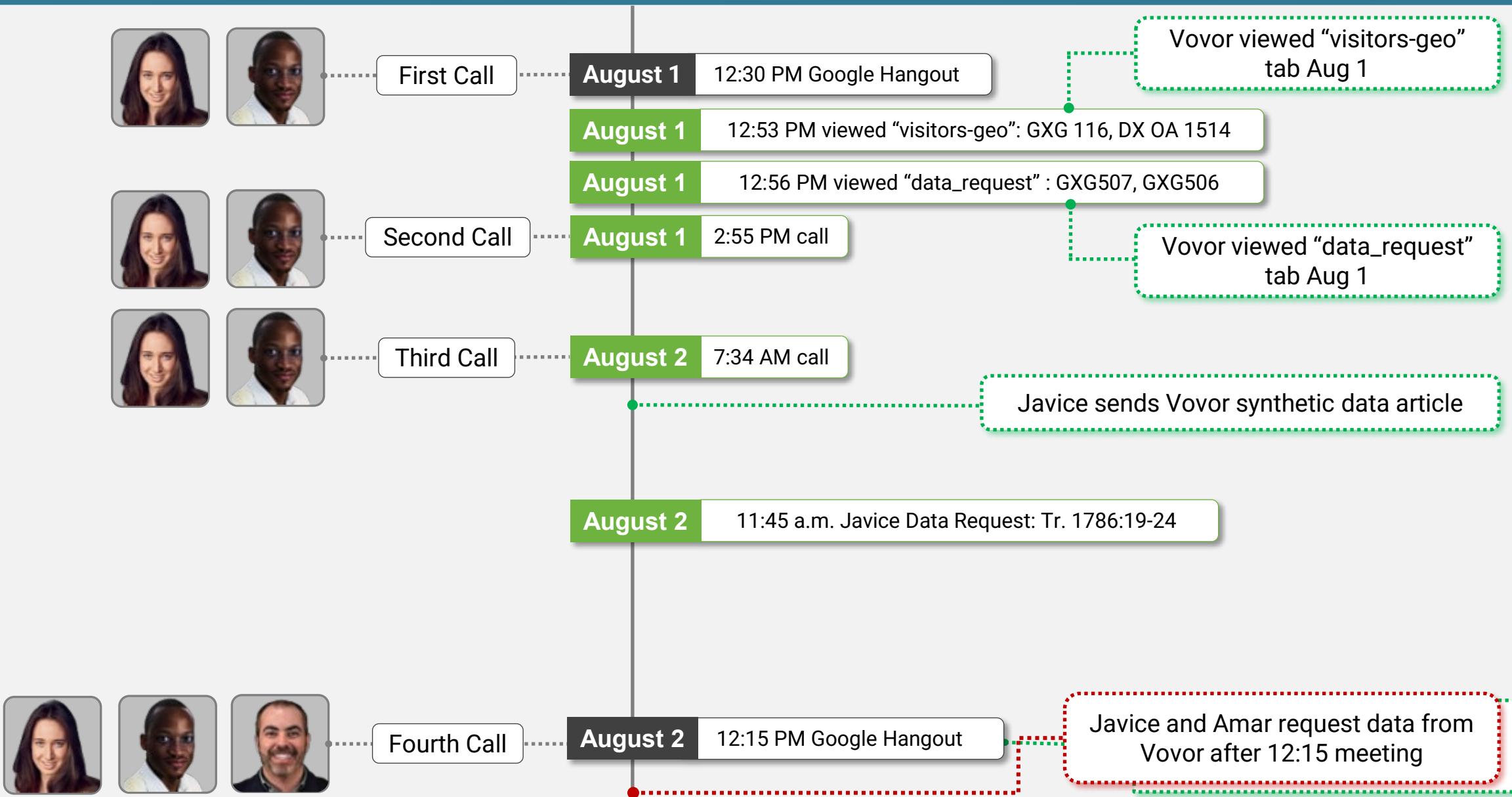
A. Okay.

Q. So does that refresh your recollection that in fact Ms. Javice had asked you to pull the data before the August 2nd call?

* * *

A. Yes.

The Truth



NO Conspiracy – August 1-2

Mr. Vovor Messaged Ms. Wong About Feeling “Not Good” Before Aug. 2 Call

CROSS
EXAMINATION



Patrick Vovor

Director of
Engineering

F R A N K .

Q. After you had your first call with Ms. Javice on August 1 at 12:30, fair to say you were already feeling uncomfortable with the request that she made of you?

A. Correct.

Q. And, in fact, you reached out to Ms. Wong on WhatsApp the following morning on August 2, did you not?

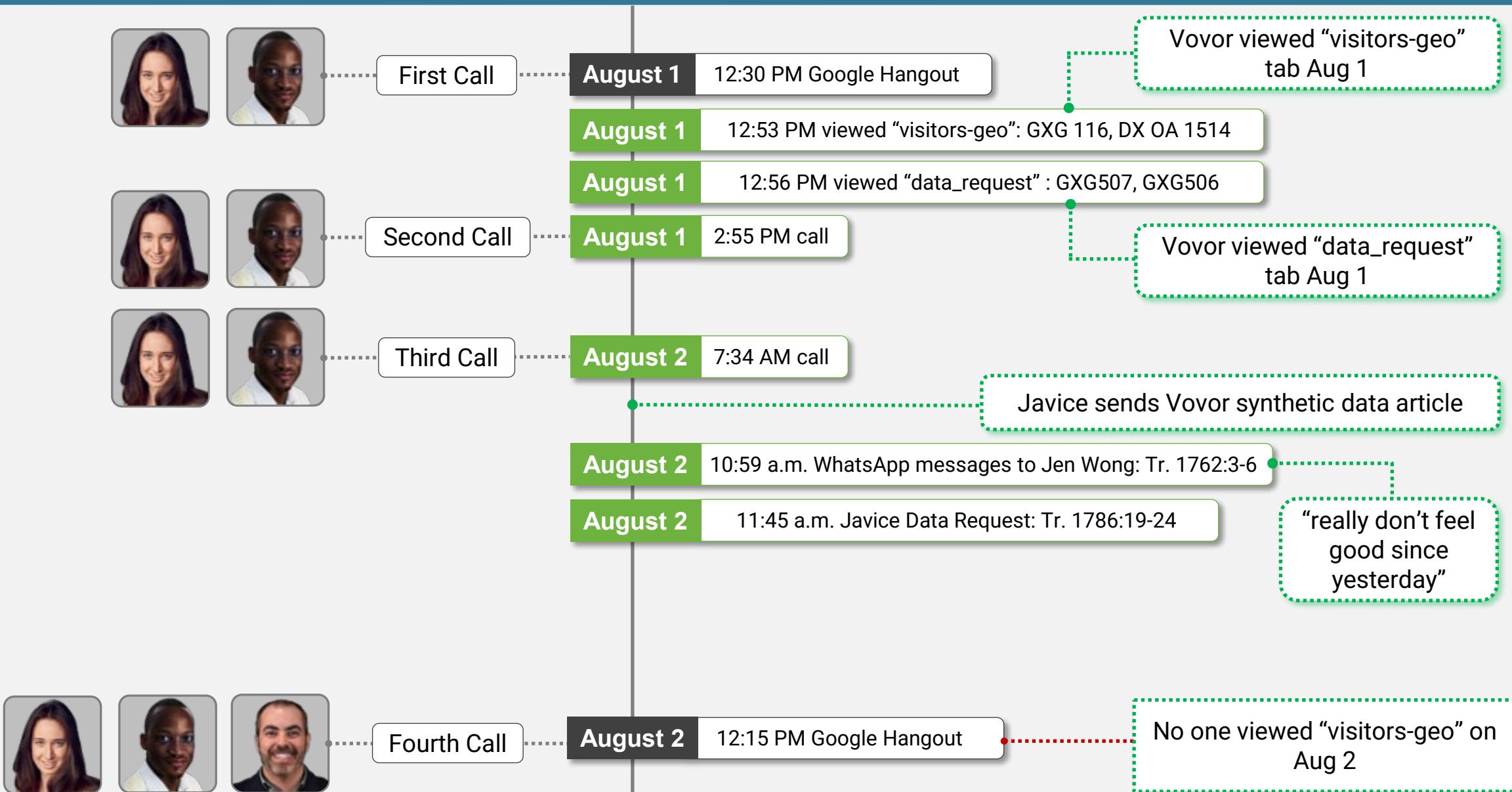
A. Correct.

* * *

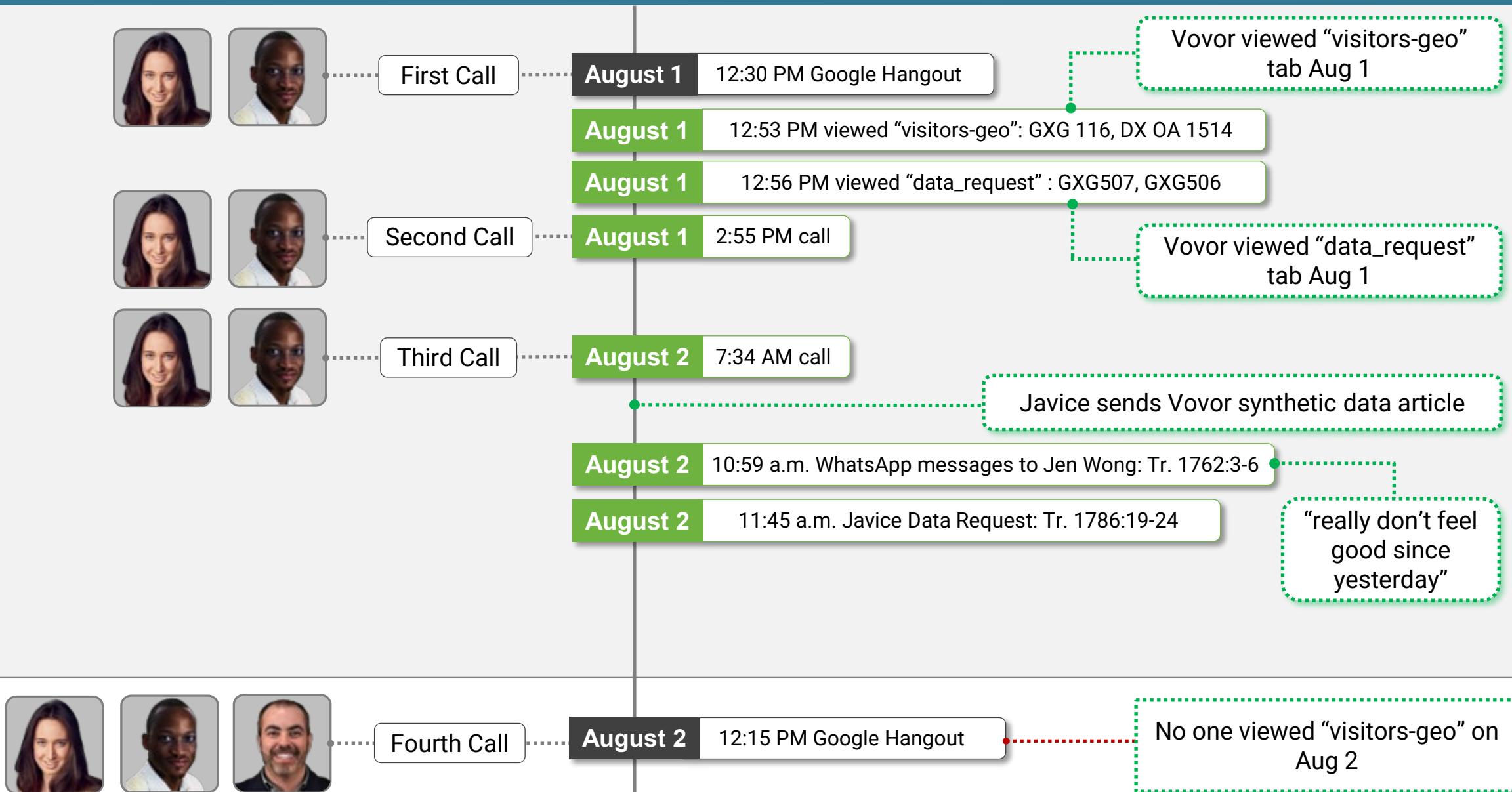
Q. Do you recall, sir, that what you told Ms. Wong before you switched over to Signal was that you really don't feel good since yesterday?

A. Yes.

The Truth



The Truth



No Conspiracy: August 1-2

Mr. Vovor Repeatedly Said Only He and Ms. Javice Were on the Aug. 1 Call



Patrick Vovor

Director of
Engineering

F R A N K.

Mr. Vovor testified **7 times** that only he and Ms. Javice were on the August 1 12:30 PM ET call.

No Conspiracy: August 1-2

The Government May Now Pivot That Mr. Amar Was On The Aug 1 Call with Ms. Javice

From: charlie@withfrank.org [charlie@withfrank.org]
Sent: 8/1/2021 3:49:49 PM
To: patrick@withfrank.org; olivier@withfrank.org
Subject: Invitation: Data Question @ Sun Aug 1, 2021

Attachments: invite.ics
Location: ◆

Start: 8/1/2021 4:30:00 PM
End: 8/1/2021 5:30:00 PM
Show Time As: Busy

Recurrence: (none)

Do not edit this section of the description.

This event has a video call.
Join: <https://meet.google.com/tam-jxod-fne>
(US) +1 832-736-0091 PIN: 615979534#
View more phone numbers: <https://tel.meet/tam-jxod-fne>

View your event at
https://calendar.google.com/calendar/event?action=TEMPLATE&at=B3axRoZnJhbmsub3Jn&tok=MjEjY2hcnxpZUB3axRoZnJh&g0Mg&ctz=America%2FNew_York&hl=en&es=1.

From: charlie@withfrank.org [charlie@withfrank.org]
Sent: 8/1/2021 3:49:49 PM
To: patrick@withfrank.org; olivier@withfrank.org

Subject: Invitation: Data Question @ Sun Aug 1, 2021 12:30pm - 1:30pm (EDT) (patrick@withfrank.org)
Attachments: invite.ics
Location: 

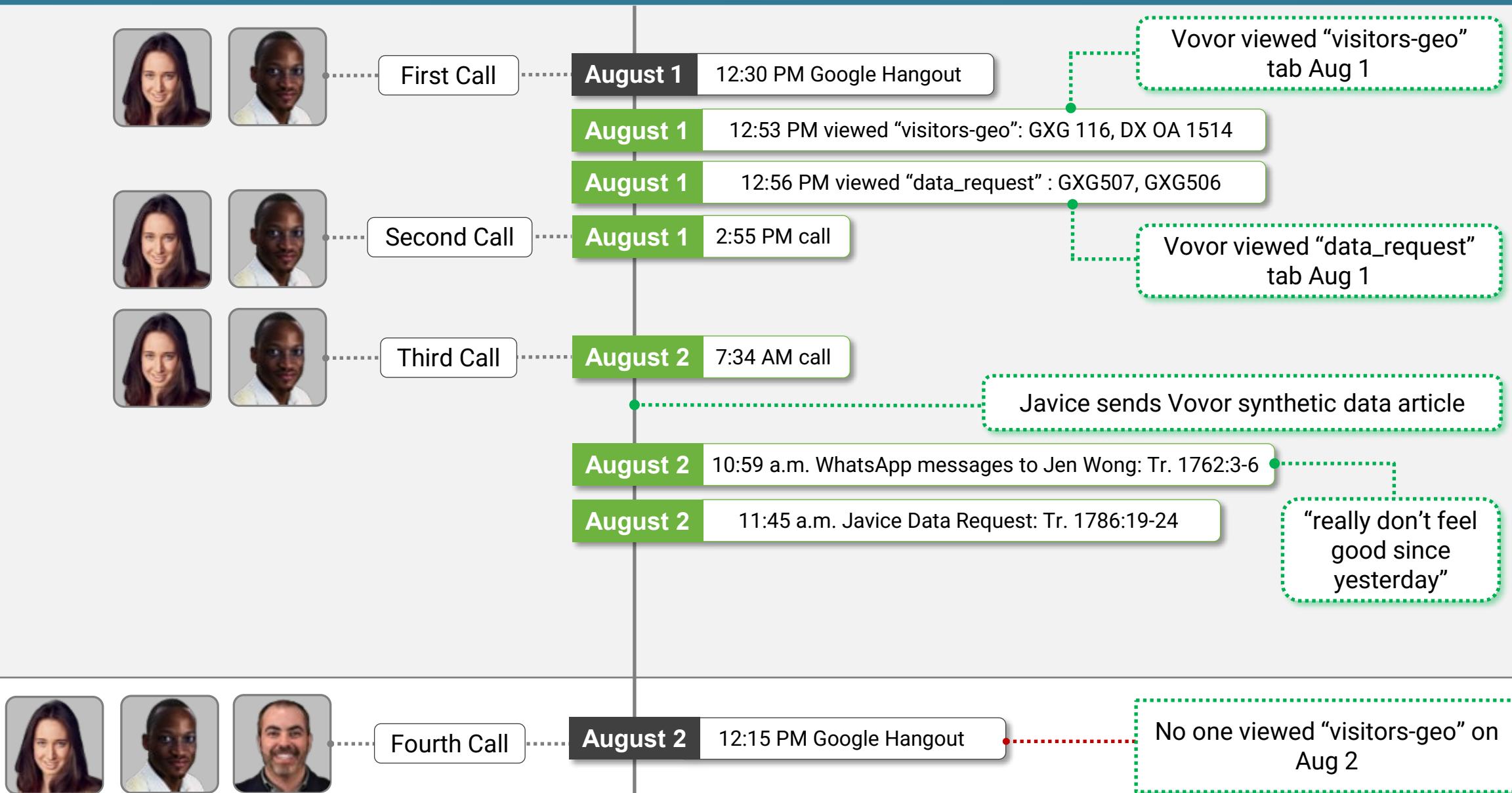


FOIA Confidential Treatment Requested by JPMorgan Chase Bank, N.A.
CONFIDENTIAL

JPMC_00643427
LISAQ_Ref_000748258



The Truth



Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 19 of 61

No Conspiracy: August 1-2

The Government’s “Proof” of a Conspiracy

**GOVERNMENT
EXHIBIT
902**
S1 23 Cr. 251 (AKH)

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 20 of 61

No Conspiracy: August 2 Google Hangout

Mr. Vovor Is Biased Against Mr. Amar

CROSS EXAMINATION



Patrick Vovor

Director of
Engineering

F R A N K .

Q. And after the acquisition you also did not have good interactions with him, correct?

A. At times, yes.

Q. In fact, after Frank was acquired by JPMorgan, Mr. Amar became your boss, right?

A. Correct.

Q. You were not happy with that.

A. Correct.

Q. And your interactions with him continued to be what you would characterize as not great, true?

A. At times, yes.

CROSS EXAMINATION



Jenny Zeitler

Marketing
Automation
Manager

Q. Did you have occasion, at the time you were at Frank, to observe—to interact with Mr. Vovor?

A. Yes.

Q. And with Mr. Amar and Mr. Vovor together at times?

A. Yes.

Q. The two of them, they butted heads, didn't they?

A. Yes.

No Conspiracy: August 2 Google Hangout

Mr. Amar Was Not Involved in Synthetic Data Request

DIRECT EXAMINATION



Patrick Vovor

Director of
Engineering

F R A N K .

PATRICK VOVOR DIRECT

Q. What did Mr. Amar ask you to generate?

A. So a big list of 4 million users which would have the same FAFSA properties in terms of statistical properties as the real data set that we had in the—our FAFSA database.

March 6, 2025, Trial Tr. 1530:14-17

THE TRUTH

Ms. Javice had three one-on-one calls with Mr. Vovor on Aug. 1-2. In connection with these calls, Ms. Javice asked Mr. Vovor to “create data”, and she provided documents to Mr. Vovor that describe various data fields requested by JPMC and an article about the use of synthetic data.

March 6, 2025, Trial Tr. 1528:23-25

No Conspiracy: August 2 Google Hangout

Mr. Amar Was Not Involved in Synthetic Data Request



Patrick Vovor

Director of
Engineering

F R A N K .

PATRICK VOVOR CROSS

Q. Okay. Now at no point on the call on August 2nd did Mr. Amar use the words “synthetic data”, did he?

A. I don’t recall.

PATRICK VOVOR DIRECT

Q. What did you hear?

A. He mentioned a list to get real data for PII information—Social Security number, email, phone number—and he mentioned the name of that source being A and two other letters. I know it was three letters acronym starting with A [...]

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 23 of 61

No Conspiracy: August 2 Google Hangout

Mr. Vovor's Story

DIRECT EXAMINATION



Patrick Vovor

Director of
Engineering

F R A N K .

PATRICK VOVOR DIRECT

COURT: What else did [Mr. Amar] say, if anything?

A. So he presented—he started the call by saying, okay, this is *my* problem, Chase is asking *me* this, FAFSA data for these 4 million users that I have on my report.

March 6, 2025, Trial Tr. 1531:10-13

THE TRUTH

The documents and testimony from JPMC witnesses show Mr. Amar had been cut out of the JPMC due diligence process for weeks, since the collapse of the Capital One deal on July 14, 2021.

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 24 of 61

No Conspiracy: August 2 Google Hangout

Mr. Vovor's Story



Patrick Vovor
Director of
Engineering

F R A N K .

PATRICK VOVOR DIRECT

COURT: What did he say?
WITNESS: [...] I asked him why it is Matt Glazer, so Frank legal and HR at the time, was not in the meeting [...] And Mr. Amar responded that Matt was not – it was not his expertise so that's why he was not there.

March 6, 2025, Trial Tr. 1564:14-21

PATRICK VOVOR CROSS

COURT: And what did they say?
WITNESS: [...] Mr. Amar said, this is not [Mr. Glazer's] expertise, but you can talk to him.

March 11, 2025, Trial Tr. 1789:24-1790:1

PATRICK VOVOR CROSS

THE COURT: At some later point did you speak with Mr. Glazer about your concerns?
THE WITNESS: No.

March 11, 2025, Trial Tr. 1790:24-1791:1

No Conspiracy: August 2 Google Hangout

Mr. Vovor Was Planning to Record the August 2 Call

CROSS EXAMINATION



Patrick Vovor
Director of
Engineering

F R A N K.

PATRICK VOVOR CROSS

Q. Now it's true, is it not, that as a result of your conversations before the August 2nd call, you were planning to record that call?

* * *

A. Yes.

* * *

Q. You were concerned that what you were being asked to do even before the call was illegal, right? You told me that.

* * *

A. Yes.

No Conspiracy: August 2 Google Hangout

Mr. Vovor's Excuse for Not Recording the Call Lacks Credibility

CROSS
EXAMINATION



Patrick Vovor

Director of
Engineering

F R A N K .

PATRICK VOVOR CROSS

Q. But you didn't record the call.

A. Correct.

Q. Why not?

A. Mismatch.

* * *

Q. Your phone was not with you.

A. No.

Q. Where was it?

A. Somewhere in the house of my parents.

* * *

Q. Did you say to the folks, Mr. Amar and Ms. Javice, can you give me two seconds, I want to take a bathroom break, I want to get a drink of water, and get your phone?

* * *

A. No.

No Conspiracy: Mr. Amar's August 1



9:51 AM

Ms. Javice sends WhatsApp messages to Mr. Amar ““Need to talk about **data pull** and **strategy**...Ur gonna need to block off ur day” (GX 801-2)



10:12 AM

Ms. Javice and Mr. Amar Call
(20 minutes)



11:12 AM

Mr. Amar creates visitors-geo
(GXG 116; DX OA 1514)



12:47 PM

Mr. Amar edits
Frank_data_strategy
(DX OA 252: DX OA 251)

12:50 PM

Mr. Amar edits
Frank_data_strategy
(DX OA 252: DX OA 251)



Data Pull

EXHIBIT
G-116
S1 23 Cr. 251 (AIC)

**GOVERNMENT
EXHIBIT
G-116**
51 23 Cr. 251 (AICR)



Data Strategy

Patrick Datta Statistics

1. **Local Strategic Partnership Change:** Change in local leadership with the local strategic partnership, including changes in the partnership leadership, strategic partnerships, location of the strategic partnership, and the ownership of the local strategic partnership.
2. **Implementing Local Strategic Partnership:** Local strategic partnership implementation, including the implementation of the local strategic partnership, implementation of the local strategic partnership, implementation of the local strategic partnership, and the implementation of the local strategic partnership.
3. **Complementing Local Strategic Partnership:** Complementing local strategic partnership, including the implementation of the local strategic partnership, implementation of the local strategic partnership, implementation of the local strategic partnership, and the implementation of the local strategic partnership.
4. **Increasing Local Strategic Partnership:** Local strategic partnership implementation and local strategic partnership implementation, including the implementation of the local strategic partnership, implementation of the local strategic partnership, implementation of the local strategic partnership, and the implementation of the local strategic partnership.
5. **Targeted Strategic Recommendations:** Local strategic partnership implementation and local strategic partnership implementation, including the implementation of the local strategic partnership, implementation of the local strategic partnership, and the implementation of the local strategic partnership.

DEFENDANT'S
EXHIBIT
OA 252

No Conspiracy: “Records Needed” Spreadsheet

No Conspiracy: Records Needed

GOVERNMENT'S OPENING STATEMENT

“And you will see that Amar got straight to work, he created a document called “records needed” that he shared with Javice. It listed all the data files that JPMorgan needed to confirm 4 million users . . .”

No Conspiracy. Records Needed

Mr. Amar Did Not Create “Records Needed”

	Funnel Steps	Percent Complete	Fields	Number of Fields
Personal Info - First Name, Last Name, Email, Phone	100%	100.00%	4,265,085.00	
Degree - Major, Year in School, Degree Level	93%	93.00%	3,966,529.05	
School List - address, birthday, college list	97%	90.21%	3,847,533.18	
Student Education - city of high school	92%	82.99%	3,539,730.52	
Kill List A - military status, is married, number of kids	98%	81.33%	3,468,935.91	
<i>Parent Education</i>	99%	80.52%	3,434,246.56	
Independent Financial - cash assets, adjusted gross income	100%	80.52%	3,434,246.56	
Independent Kill List B - student completed tax returns, investments, pers	72%	57.97%	2,472,657.52	
SSN & Gender - Is US citizen	99%	57.39%	2,447,930.94	
Complete				2,100,184

No Conspiracy. Records Needed

Mr. Amar Created a Spreadsheet Titled “Funnel Since Aug 1, 2020”

CROSS
EXAMINATION



Cory Gaddis
Records Custodian

Google

Q. On August 3 at 14:27:37 UTC, the metadata here shows
Olivier@withFrank.org took an action to create this document; correct?

A. Yes.

Q. And at that time it was called Untitled_Spreadsheet; correct?

A. Yes.

* * *

Q. August 3, 2021 at 14:27:37 UTC? [. . .] Same time as before?

A. Yes.

Q. So the GAIA ID ending in 132 took an action to rename the document Funnel Since Aug 1 2020; correct?

A. Yes.

Q. To be clear, the account ending in 132, that is the one associated with Olivier@withFrank.org; correct?

A. Yes.

No Conspiracy. Records Needed**No Proof What “Funnel Since Aug 1, 2020” Looked Like When Mr. Amar Created It****CROSS EXAMINATION**

Cory Gaddis
Records Custodian

Google



Q. And Mr. Gaddis, you have no way of knowing from the metadata here what Funnel Since August 1, 2020 looked like, do you?

A. No.

Q. So you don't know what content was in that document?

A. No.

Q. You don't where that content was sourced from?

A. No.

	Funnel Steps	Percent Complete Fields	Number of Fields
Personal Info - First Name, Last Name, Email, Phone	100%	100.00%	4,265,085.00
Degree - Major, Year in School, Degree Level	93%	93.00%	3,966,529.05
School List - address, birthday, college list	97%	90.21%	3,847,531.18
Student Education - city of high school	92%	82.99%	3,559,735.52
Kill List A - military status, is married, number of kids	98%	81.33%	3,468,35.91
Parent Education	99%	80.52%	3,434,46.55
Independent Financial - cash assets, adjusted gross income	100%	80.52%	3,434,246.55
Independent Kill List B - student completed tax returns, investments, p	72%	57.97%	2,472,657.52
SSN & Gender - Is US citizen	99%	57.39%	2,447,930.94
Complete			2,100,184

GOVERNMENT EXHIBIT G-72
51 23 Cr. 251 (AKH)

GOVERNMENT EXHIBIT G-73
51 23 Cr. 251 (AKH)

No Conspiracy. Records Needed

Ms. Javice Renamed “Funnel Since Aug 1, 2020” to “Records Needed”

CROSS EXAMINATION



Cory Gaddis
Records Custodian

Google

Q. And if the earlier rename we looked at was 14:27 UTC, is this around 30 minutes later?

A. Yes.

* * *

Q. And there's a Gaia ID. Looking at the chart, [...] what's the email address for that Gaia ID?

A. Charlie@withfrank.org.

Q. All right. And underneath Actions, what does it say under Actions?

A. It says Edit and Rename Previous Title.

Q. And what's the previous title?

A. Funnel Since August 1, 2020.

* * *

Q. Mr. Gaddis, what's the new title?

A. Records Needed.

No Conspiracy. Records Needed

Mr. Amar Never Edited or Viewed “Records Needed”

CROSS
EXAMINATION



Cory Gaddis
Records Custodian

Google

THE COURT: Is there another change in this document that Mr. Amar is responsible for after the name: Funnel?

THE WITNESS: Not that I could see on there, your honor.

No Conspiracy: January 14 Recording

No Conspiracy. January 14 Recording

Ms. Javice (Again) Directs Both Mr. Vovor and Mr. Amar

Mr. Amar to Ms. Javice:

“When did you. I didn’t see an email for a team request”

* * *

“I don’t remember this email”

* * *

“Do me a favor – do an email for the S3 for exactly what you want with the breakdown of the years to Patrick and myself and we’ll get it out.”



GOVERNMENT
EXHIBIT
300-T
S1 23 Cr. 251 (AKH)

No Conspiracy. January 14 Recording

The Recording Proves Mr. Amar Was in the Dark

AMAR: Ok. Ça c'est l. Il y en a – elle était dans le S3 bucket, tu m'appelles, tu dis que elle a été augmentée ? Augmenter [laughs], qu'elle a enrichi. Ouvre l'onglet. Elle va l'ouvrir un clic. Il faut extraire le nombre de personnes qu'elle a demandé à l'IRS, that's it.

[00:06:02] Ok mais quand tu vas l'extraire, fais-moi une faveur. Si je me rappelle bien, les utilisateurs IRS dans cette liste, ils avaient déjà une liste de leur côté avec quelques choses qu'ils nous ont donné avec la liste. Y avait une grande, [list]. [00:06:30] Je veux partir avec les utilisateurs qui sont le plus fresh. Il y a un paramètre à l'IRS, un attribut, qui délimite les utilisateurs, ils disent de quoi. Il faut... Ça va être quelque chose... Ça les organise par date, and we cut it au clic que ça devient, whatever. Ok, tu comprends ce que je veux dire.

AMAR: Ok, that's number 1. There will be – she wants to do another task augmented? Augmented, [laughs], that she enriched.

[...]

VOVOR: Uh ok, la liste enrichie, je l'ai pas, je ne l'ai jamais qu'elle est.

VOVOR: Uh ok, the enriched list, I don't have it, I have never had it.

[00:07:00]

AMAR: Elle est dans le S3 bucket, c'est toi qui l'a mis là-bas.

AMAR: It is in the S3 bucket, you're the one who put it there.

GX300-T
Transcript by TransPerfect

VOVOR: Non, non, non, moi j'ai jamais rien enrichi. Non, moi j'ai donné nos utilisateurs, ensuite Charlie elle l'a pris, et elle a fait ce qu'elle voulait avec.

VOVOR: No, no, no, I have never enriched anything. No, I gave our users, then Charlie, she took it, and she did what she wanted with it, with the data scientist.

AMAR: Ok so the FAFSA list.

VOVOR: Ok.

[00:07:30]

AMAR: Augmented, [laughs], that she enriched[.]

VOVOR: Uh ok, the enriched list, I don't have it, I have never had it. So I it is.

AMAR: It is in the S3 bucket, you're the one who put it there, aren't you?

[Minute 7:00]

VOVOR: No, no, no, I have never enriched anything. No, I gave our users, then Charlie, she took it, and she did what she wanted with it, with the data scientist

GOVERNMENT
EXHIBIT
300-T
S1 23 Cr. 251 (AKH)

No Conspiracy. January 14 Recording

The Recording Proves Mr. Amar Was in the Dark

WhatsApp



Olivier Amar, Jan. 14 2022 3:15 PM UTC (10:15 AM ET)

Patrick says he never touched the ASL list



Charlie Javice, Jan. 14 2022 3:15 PM UTC (10:15 AM ET)

i know\



Olivier Amar, Jan. 14 2022 3:15 PM UTC (10:15 AM ET)

Adam will have to do the ASL list

GOVERNMENT
EXHIBIT
801-46
51 23 Cr. 251 (AKH)

No Conspiracy. January 14 Recording

“Marketable Users” Are Just Website Visitors with Cookies

DIRECT
EXAMINATION



Jenny Zeitler
Marketing Automation
Manager
F R A N K .

JENNY ZEITLER CROSS

Q. Someone who is able to be tracked across websites, in the context of retargeting, would be a **marketable user**; is that right?

A. Yes.

March 20, 2025 Trial Tr. 3111:8-11

No Conspiracy. January 14 Recording

Only Ms. Javice Edits and Sends User Breakdown Sheet

DIRECT EXAMINATION



Peter Manning
NAXO



Q. Did the GAIA associated with Olivier@withfrank.org ever edit this document?

A. No.

From: Charlie Javice [charlie@withfrank.org]
on behalf of Charlie Javice <charlie@withfrank.org> [charlie@withfrank.org]
Sent: 1/18/2022 7:14:16 PM
To: Divilek, Sonali [sonali.divilek@chase.com]; Seideman, Neil [neil.seideman@chase.com]; Macdonald, Ryan S [ryan.s.macdonald@jpmorgan.com]; Amar, Olivier [olivier.amar@chase.com]
Subject: User Breakdown
Attachments: User_Breakdown_2021_Update (1).xlsx

Sharing the spreadsheet with user counts with the feedback from Neil and Sonali that is incorporated from earlier today. Feel free to share the breakdown with your team. Olivier has already shared the net number last week with Kelly and Mark.

From the spreadsheet attached, you can see the following:

5.6MM users – our total churned users (graduated students) **3.88MM** – Partner Co-Brand sites **0.73MM** = **0.99 net marketable users**

Our team has now cleaned the customer files and just merging them so that it's easy and ready for direct mail and email campaigns you want to test. Thanks for your patience.

Charlie

--
Charlie Javice
Frank 1 Founder & CEO
withfrank.org | 914.575.9314
Student COVID-19 resource

GOVERNMENT EXHIBIT
1693
51 23 Cr. 251 (AKH)

No Conspiracy: February Data Transfer

No Conspiracy: Data Transfer

No Evidence Mr. Amar Reviewed or Uploaded the February Transfer Files

CROSS EXAMINATION



Manole
Pelarinos

Managing Director,
Head of Digital
Channels

 JPMorgan Chase

Q. Did you check the access logs with respect to Amazon Web Services to see who had access to it in 2022?

A. I did not.

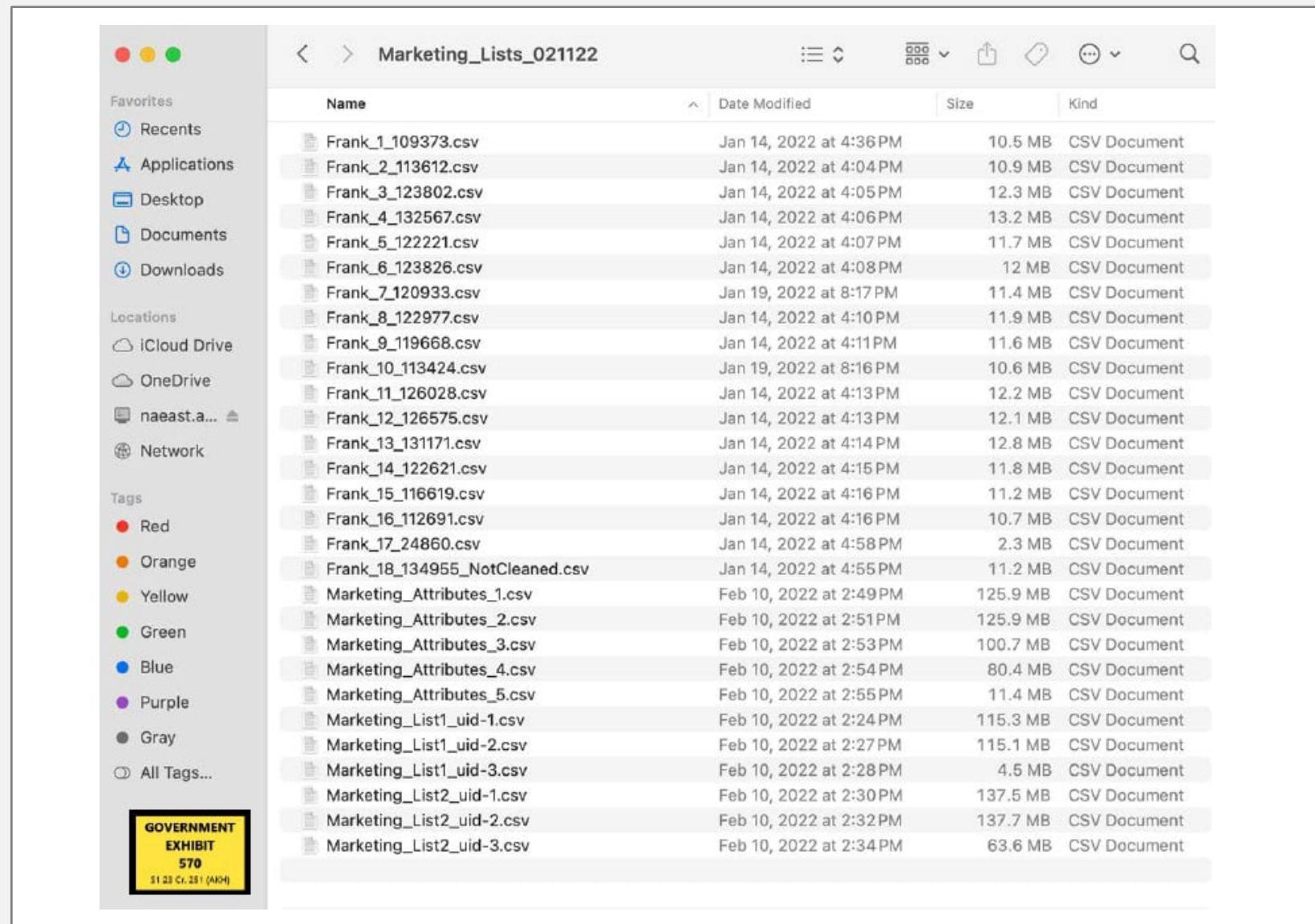
Q. **So you have no basis to know whether Mr. Amar had access to Amazon Web Services in 2022?**

* * *

A. **Correct.**

No Conspiracy: Data Transfer

No Indication of What Any of the Files Contained



Name	Date Modified	Size	Kind
Frank_1_109373.csv	Jan 14, 2022 at 4:36PM	10.5 MB	CSV Document
Frank_2_113612.csv	Jan 14, 2022 at 4:04PM	10.9 MB	CSV Document
Frank_3_123802.csv	Jan 14, 2022 at 4:05PM	12.3 MB	CSV Document
Frank_4_132567.csv	Jan 14, 2022 at 4:06PM	13.2 MB	CSV Document
Frank_5_122221.csv	Jan 14, 2022 at 4:07PM	11.7 MB	CSV Document
Frank_6_123826.csv	Jan 14, 2022 at 4:08PM	12 MB	CSV Document
Frank_7_120933.csv	Jan 19, 2022 at 8:17PM	11.4 MB	CSV Document
Frank_8_122977.csv	Jan 14, 2022 at 4:10PM	11.9 MB	CSV Document
Frank_9_119668.csv	Jan 14, 2022 at 4:11PM	11.6 MB	CSV Document
Frank_10_113424.csv	Jan 19, 2022 at 8:16PM	10.6 MB	CSV Document
Frank_11_126028.csv	Jan 14, 2022 at 4:13PM	12.2 MB	CSV Document
Frank_12_126575.csv	Jan 14, 2022 at 4:13PM	12.1 MB	CSV Document
Frank_13_131171.csv	Jan 14, 2022 at 4:14PM	12.8 MB	CSV Document
Frank_14_122621.csv	Jan 14, 2022 at 4:15PM	11.8 MB	CSV Document
Frank_15_116619.csv	Jan 14, 2022 at 4:16PM	11.2 MB	CSV Document
Frank_16_112691.csv	Jan 14, 2022 at 4:16PM	10.7 MB	CSV Document
Frank_17_24860.csv	Jan 14, 2022 at 4:58PM	2.3 MB	CSV Document
Frank_18_134955_NotCleaned.csv	Jan 14, 2022 at 4:55PM	11.2 MB	CSV Document
Marketing_Attributes_1.csv	Feb 10, 2022 at 2:49PM	125.9 MB	CSV Document
Marketing_Attributes_2.csv	Feb 10, 2022 at 2:51PM	125.9 MB	CSV Document
Marketing_Attributes_3.csv	Feb 10, 2022 at 2:53PM	100.7 MB	CSV Document
Marketing_Attributes_4.csv	Feb 10, 2022 at 2:54PM	80.4 MB	CSV Document
Marketing_Attributes_5.csv	Feb 10, 2022 at 2:55PM	11.4 MB	CSV Document
Marketing_List1_uid-1.csv	Feb 10, 2022 at 2:24PM	115.3 MB	CSV Document
Marketing_List1_uid-2.csv	Feb 10, 2022 at 2:27PM	115.1 MB	CSV Document
Marketing_List1_uid-3.csv	Feb 10, 2022 at 2:28PM	4.5 MB	CSV Document
Marketing_List2_uid-1.csv	Feb 10, 2022 at 2:30PM	137.5 MB	CSV Document
Marketing_List2_uid-2.csv	Feb 10, 2022 at 2:32PM	137.7 MB	CSV Document
Marketing_List2_uid-3.csv	Feb 10, 2022 at 2:34PM	63.6 MB	CSV Document

GOVERNMENT
EXHIBIT
570
51:23 Cr. 251 (AKH)

GOVERNMENT
EXHIBIT
570
51:23 Cr. 251 (AKH)

Conscious Avoidance

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 45 of 61

Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on June 23

**DIRECT
EXAMINATION**



Mason Young
Senior Vice President



Q. Mr. Young, who from Frank do you recall attending this June 23 meeting?

A. Ms. Javice, Mr. Glazer, and Mr. Amar.

* * *

Q. Mr. Young, do you see there is a question there: How do you define user?

A. Yes.

* * *

Q. Did anyone answer this question during the June 23 meeting?

A. They did.

Q. Who do you recall answering that question?

A. Ms. Javice.

Mr. Amar Did Not Consciously Avoid Misrepresentations: Matt Glazer Also Missed Ms. Javice's Alleged Misrepresentations

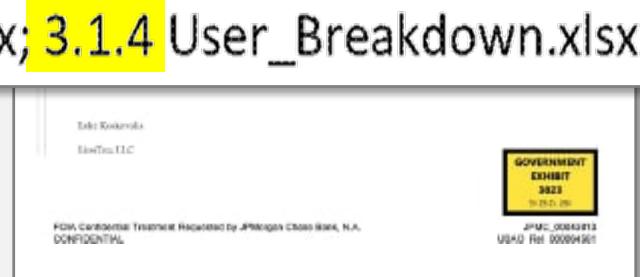
Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/23 Page 46 of 61



Attachments: 3.1.1 2021 Users to Date.xlsx; 3.1.4 User_Breakdown.xlsx



Attachments: Retention Definitions_CJ_V2.docx



Attachments: 3.2.1 CAC Summary.xlsx; 3.1.1 2021 Users to Date.xlsx; 3.1.4 User_Breakdown.xlsx

FDA Confidential Treatment Requested by JPMorgan Chase Bank, N.A.
CONFIDENTIAL



**GOVERNMENT
EXHIBIT
3027**
S1 23 Cr. 251

**GOVERNMENT
EXHIBIT
3023**
S1 23 Cr. 251

**GOVERNMENT
EXHIBIT
3026**
S1 23 Cr. 251

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 47 of 61

Mr. Amar Did Not Consciously Avoid Misrepresentations: The Truth

CROSS
EXAMINATION



Mason Young
Senior Vice President



Q. Now, am I right that the definition of a user was provided as well on the **June 23 meeting** that we are talking about now?

A. Yes.

* * *

COURT: Do you remember, in this particular instance when you recall that Ms. Javice gave you a definition of user, that she turned to Mr. Amar for any kind of information?

WITNESS: I don't recall that.

COURT: Do you recall seeing Mr. Amar on the screen at the time you heard this definition of user?

WITNESS: We are talking about three and a half years ago. I'm --

COURT: I'm not criticizing, sir. I am just asking for your recollection.

WITNESS: **I don't recall seeing Mr. Amar's face at the time that Ms. Javice or Capital One was asking about the definition of a user.**

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 48 of 61

Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on July 8

**DIRECT
EXAMINATION**



Mason Young
Senior Vice President



Q. Mr. Young, do you recall a meeting that occurred around July 8 of 2021?

A. I do.

March 12, 2025 Trial Tr. 2145:19-21

Q. Who, from Frank, do you recall participating in this meeting?

A. Ms. Javice and Mr. Amar.

Q. How did this meeting take place?

A. Over Zoom.

Q. Who do you recall spoke at the meeting?

A. Primarily Ms. Javice, with Mr. Amar answering any questions that Ms. Javice deferred to him.

March 12, 2025 Trial Tr. 2146:4-11

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 49 of 61

Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on July 8

DIRECT
EXAMINATION



Mason Young
Senior Vice President



Q. Mr. Young, was the information on this slide [8] discussed during the July 8 meeting?

A. Yes.

Q. Who do you recall, best that you can remember, discussing the information on this slide?

A. Combination of Ms. Javice and Mr. Amar.

Q. Do you see at the top where it says: Breakdown of first six months of non-paid users?

A. Yes.

Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on July 8

Re:em: Cowan, Houston <HCowan@bentonw.org>.
on behalf of: Cowan, Houston <HCowan@bentonw.org> <HCowan@bentonw.org>
Sent: 7/8/2021 4:06:26 PM
To: Charlie Joyce <charlie@withthefans.org>; Oliver Amar <oliver@withthefans.org>; LT-ProjectFinance@hamrrc.com; RABU11 <rabu11.judicial@capitalone.com>; Andrew Christensen <andrew.christensen@capitalone.com>; Mason Young <mason.young@capitalone.com>; Jessica Scopetta <jessica.scopetta@capitalone.com>; Joseph Casula <joseph.casula@capitalone.com>

CC: Roskowitz, Luke [REDACTED]
Subject: RE: Project Frontier
Attachments: Project Frontier Cap

Ahead of the discussion, Brad attracted

Best,
Houston

Houston County
SlopeTree LLC
© 262-758-1313

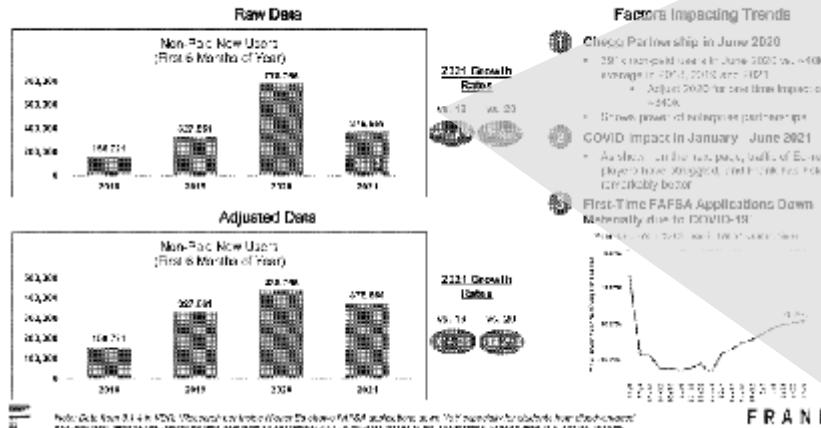
Join Zoom Meeting
<https://umt.zoom.us/j/9300833>

Meeting ID: 560 0633 9258
Passcode: 649687
One tap mobile
+19292056099,,9609883975#,,^{*84}

FOIA Confidential Treatment Requested
CONFIDENTIAL

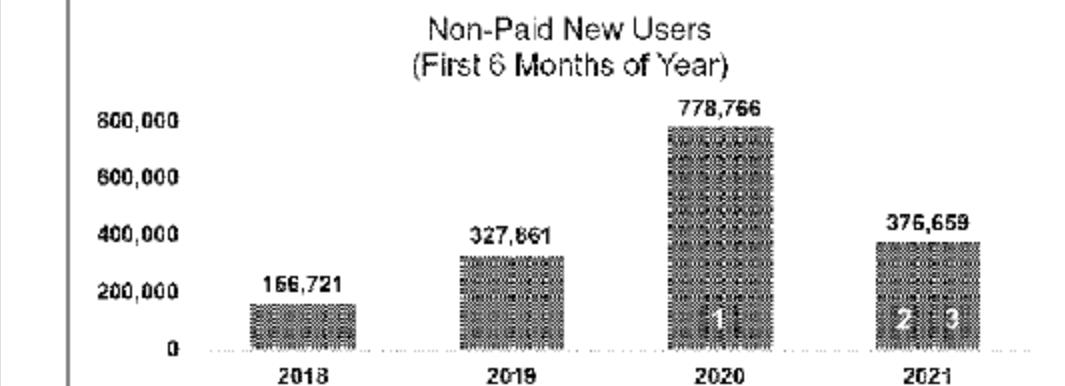
From: Cowan, Houston [HCowan@lontree.com]
on behalf of
Sent: Cowan, Houston <HCowan@lontree.com> [HCowan@lontree.com]
7/8/2021 4:06:26 PM
To: Charlie Javice [charlie@withfrank.org]; Olivier Amar [olivier@withfrank.org]; LT-ProjectFrontier@lontree.com; RAHUL JINDAL [rahul.jindal@capitalone.com]; Amanda Christianson [amanda.christianson@capitalone.com]; Mason Young [mason.young@capitalone.com]; jessica.boccardo@capitalone.com; joseph.casola@capitalone.com
CC: Koskopolis, Luke [LKoskopolis@lontree.com]
Subject: RE: Project Frontier Discussion with Capital One
Attachments: Project Frontier Capital One Meeting Follow-Up (07.08.2021).pdf

Breakdown of First 6 Months Non-Paid User Trends



Breakdown of First 6 Months Non-Paid User Trends

Raw Data



**GOVERNMENT
EXHIBIT
3040
S1 23 Cr. 251**

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 51 of 61

Mr. Amar Did Not Consciously Avoid Misrepresentations: The Truth

CROSS
EXAMINATION



Mason Young
Senior Vice President



Q. Sir, isn't it a fact that you joined in the middle of the meeting, 21 minutes into it before you got on?

A. Sounds like you know more than I do.

Q. Well, forget what I know?

* * *

Q. Okay. Do you recall that you were only on that call for a sum total of 12 minutes on that day?

A. I don't recall.

Q. Do you recall that you dropped off eight minutes before the call ended?

A. I don't recall.

* * *

Q. **So as you sit here today, you don't even know if Mr. Amar attended that meeting, you just know he was invited to it, right?**

A. Correct.

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 52 of 61

Mr. Amar Did Not Consciously Avoid Misrepresentations: The Government's Story on July 12

REDIRECT
EXAMINATION



Sindhu
Subramaniam
Vice President,
Corporate
Development and M&A



Q. And when did Mr. Amar speak relative to the discussion about users [on July 12]?

A. Just before.

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 53 of 61

Mr. Amar Did Not Consciously Avoid Misrepresentations: The Truth

CROSS
EXAMINATION



**Sindhu
Subramaniam**

Vice President,
Corporate
Development and M&A

Q. Fair to say you don't remember anyone's camera being on at any point during the session?

A. I do not know.

Q. So, other than when Mr. Amar was actually talking about growth and partnerships and how they would grow the business, fair to say you don't know what he was actually doing?

A. I wouldn't know.

Q. You don't know if he was even in front of his computer screen listening to the discussion other than when what he was actually speaking during the meeting; true?

A. I don't know.

Case 1:23-cr-00251-AKH Document 383-7 Filed 04/28/25 Page 54 of 61

Mr. Amar Did Not Consciously Avoid Misrepresentations: Even When Pushed, Witnesses Couldn't Remember

REDIRECT
EXAMINATION



Ryan
MacDonald
Head of Growth for
Financial Products

JPMorganChase

Q. Well does that refresh your recollection about what Mr. Amar said during the July 12, 2021 meeting?

[. . .]

A. Again, my recollection is that he was specifically discussing **elements of their marketing strategy**, yeah.

Q. Did [Mr. Amar] say anything about quantities?

A. I don't – **I still don't recall** Mr. Amar saying anything specific about quantities or users.

* * *

Q. You can't say who was in this – in the room?

A. **I know that Ms. Javice was there. I don't recall if Mr. Amar spoke to this section or not.**

Beware of the Rebuttal

Beware of the Rebuttal

REDIRECT EXAMINATION



Steve Stolls

Executive Vice President of
Sales and Marketing

ASL Marketing



Q. If we can zoom in on Mr. Amar's e-mail on the top? Do you see where he says: I'd like the tots to be 4.5 million, so yes, please?

A. Yes.

Q. Other than 4.5 million, do you recall Mr. Amar requesting any other volume of student data?

A. I don't. I don't recall.

From: Denise Lyn<IMCEAEX-
_O=EXCHANGELABS_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29_CN=RECIPIENTS_CN=D85A29A6D37742A3A4AF2D7ACBC3898A-
DLYN@namprd15.prod.outlook.com
Sent: Mon 8/2/2021 3:31:28 PM Coordinated Universal Time

To: Steve Stolls<stolls@aslmarketing.com>
Sent on behalf of: Denise Lyn <IMCEAEX-
_O=EXCHANGELABS_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29_CN=RECIPIENTS_CN=D85A29A6D37742A3A4AF2D7ACBC3898A-
DLYN@namprd15.prod.outlook.com>
Subject: WithFrank.org- College Market

From: Denise Lyn<IMCEAEX-
_O=EXCHANGELABS_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29_CN=RECIPIENTS_CN=D85A29A6D37742A3A4AF2D7ACBC3898A-
DLYN@namprd15.prod.outlook.com>
Sent: Mon 8/2/2021 3:31:28 PM Coordinated Universal Time

I just got off the phone with the prospect, he is in the college market

<http://withfrank.org/>

He has a house file that he wants to append (augment data to). The second part is postal mailing.

He is looking for 10MM records and would like a call.

He is looking to move very "quickly" on this and would like a call today.

Are you available today for a call?

He is looking for 10MM records and would like a call.

**GOVERNMENT
EXHIBIT
2302
S1 23-Cr-251 (AKH)**

Beware of the Rebuttal

CROSS
EXAMINATION



Patrick Vovor
Director of
Engineering

F R A N K .

COURT: Did they mention . . . that you could speak with [Mr. Glazer]?

WITNESS: I believe so.

COURT: [And] what did they say?

WITNESS: [. . .] **Mr. Amar said, this is not his expertise, but you can talk to him.**

Beware of the Rebuttal

REDIRECT EXAMINATION



Patrick Vovor
Director of
Engineering

F R A N K .

Q. What happened to Mr. Glazer in August of 2021, with respect to his role at Frank?

A. He left Frank.

Beware of the Rebuttal

REDIRECT
EXAMINATION



Mason Young
Senior Vice President



Q. Mr. Young, do you see where it says: Project Frontier Discussion with Capital One?

A. Yes.

Q. And then it says July 8, 12:30 to 1:00 p.m.?

A. Yes.

* * *

Q. What does it say above Project Frontier discussion with Capital One?

A. Olivier@withFrank.org has accepted this invitation.

Beware of the Rebuttal

REDIRECT EXAMINATION



Mason Young
Senior Vice President



Q. I want to direct your attention to this e-mail: . . . We have some follow-up questions and thought it would be best to address them directly with Olivier on a 30-minute call. Do you see that?

A. I do.

Q. And you see that there are certain topics listed there?

A. Yes

Q. So student age, FAFSA starts and completes . . .

A. . . . Because in his role as head of growth at Frank, he was responsible for customer acquisition . . .

From: RAHUL JINDAL <rashul.jindal@capitalone.com>
Sent: Wednesday, July 7, 2021 2:29 PM
To: Cowan, Houston <H.Cowan@liontree.com>
Cc: Amanda Christianson <amanda.christianson@capitalone.com>; Agarwal, Nikhil <nikhil.agarwal@liontree.com>; Mason Young <mason.young@capitalone.com>; Koskova, Luka <L.Koskova@liontree.com>; Florian Ceteraberndt <florian.ceteraberndt@capitalone.com>; Michael, Alex <AMichael@liontree.com>
Subject: Re: [External Sender] RE: Call w/ Charlie & mgmt. meetings

Hi Houston,
I hope that this email finds you well. Appreciate you organizing time with the team yesterday, following on from that meeting we had some follow up questions and thought it would be best to address them directly with Olivier on a 30 mins call today, if possible. Would you mind asking if he can connect with us at 5:30pm today?

Topics we would like to discuss:

- Student age / demographic split
- FAFSA starts and completion
- Retention / cross-sell by product

GOVERNMENT
EXHIBIT
1691
51 23 Cr. 251 (AKH)

Conclusion